

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

SCHEEL PUBLISHING, INC., <i>et al</i> ,)	CASE NO. 1:20-CV-76
)	
Plaintiff,)	JUDGE DAN POLSTER
)	
vs.)	
)	
RIYAD (ROD) KHLEIF, <i>et al</i> ,)	MOTION TO ALLOW DEFENDANTS'
)	REPRESENTATIVE TO APPEAR BY
Defendants.)	PHONE

Defendants Riyad (Rod) Khleif, Tiffany Lowe-Khleif, Lifetime Cashflow Academy, LLC, and REM Equity Group, LLC (collectively, "Defendants"), by and through the undersigned counsel, respectfully move this Honorable Court to allow party representative Defendant Rod Khleif to appear by telephone for the Case Management Conference scheduled for March 13, 2020. Mr. Khleif seeks to participate by phone for two reasons, namely, (1) he has a business meeting that was scheduled prior to the scheduling of the Case Management Conference and must pick up an individual for the meeting from the airport, and (2) with the continuing spread of the coronavirus getting worse, he would like to limit his travel as much as possible. Mr. Khleif was already in Ohio for the mediation last week. This request is brought in good faith and Mr. Khleif is fully able to participate in any meaningful discussion via telephone from his residence in Florida, including any settlement discussions. On that note, settlement discussions are continuing even in light of the failed mediation as Defendants have made a further settlement offer to Plaintiffs. Plaintiffs have not yet responded.

Pursuant to the above, Defendants respectfully request that the Court grant this Motion and allow Defendant Rod Khleif to attend the Case Management Conference by phone.

Respectfully Submitted,

EMERSON THOMSON BENNETT, LLC

/s/John M. Skeriotis

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